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August 28, 2020

By ECF and E-Mail

The Honorable Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

The Honorable Robert M. Levy
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Sinmyah Ceasar*, Nos. 19 Cr. 117 (KAM/RML)
17 Cr. 48 (KAM/RML)

Dear Judge Matsumoto and Judge Levy:

We write on behalf of the above-referenced defendant to respectfully request that the Court set a monthly status conference (either in-person or remotely, depending on the public health circumstances) in lieu of Probation submitting a monthly written report. We make this request with the consent of Probation and the Government, in light of the unusual circumstances of this case.

Ms. Ceasar is a young person facing significant re-entry obstacles, with no family support and a severe trauma history. She has previously shown the ability to comply and even thrive when she has support and clear structure. Probation and our Office have been working closely with her since her release from custody one month ago. We believe that the addition of a monthly session with the Court, at which her progress and obstacles are openly discussed with her, and she is part of, and observes, a collaborative commitment to her success will greatly aid in her re-entry, and be more efficacious than Probation submitting a report in writing that Ms. Caesar reads separately.

We understand that a monthly conference imposes a substantial burden on the Court. Judge Levy previously engaged in a series of conferences with Ms. Caesar along the lines we are requesting that were very helpful to her, and he is quite familiar with the facts of her case from

his pre-trial involvement; if Judge Levy is willing to conduct the requested monthly conferences that could provide useful continuity for Ms. Ceasar.

Finally, we ask that these monthly conferences be conducted under seal so that Ms. Ceasar, counsel and Probation can discuss the details of her mental health treatment, medical issues, housing, and job search without such personal information being made public.

Respectfully submitted,

/s/

Deirdre D. von Dornum
Samuel I. Jacobson
Assistant Federal Defenders

cc: Counsel of record (via ECF)
Senior U.S. Probation Officer Michael Imrek